

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas  
*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,  
Plaintiffs,  
v.

Planned Parenthood Federation of America, Inc.,  
Planned Parenthood Gulf Coast, Inc., Planned  
Parenthood of Greater Texas, Inc., Planned  
Parenthood South Texas, Inc., Planned Parenthood  
Cameron County, Inc., Planned Parenthood San  
Antonio, Inc.,  
Defendants.

CIVIL ACTION NO. 2:21-CV-  
00022-Z

Date: December 16, 2022

**DEFENDANTS' MOTION TO COMPEL THE STATE OF TEXAS  
TO REVISE ITS PRIVILEGE LOG AND PRODUCE CERTAIN DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 37, Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc. (together, "Affiliate Defendants"), and Planned Parenthood Federation of America, Inc. (together with Affiliate Defendants, "Defendants"), hereby respectfully move the Court the Court to compel Plaintiff the State of Texas to:

1. Submit affidavits or other evidence sufficient to justify and support its claims of privilege over the categories of materials identified in the brief in support of this Motion, as well as the process it used to determine which documents would be withheld as privileged and then to describe those documents on its logs.
2. Revise its privilege logs to bring them in compliance with the Court's Orders, including by reconsidering the applicability of its assertions of privilege, so that Defendants can properly assess Texas's privilege claims.
3. Produce all documents Texas has withheld pursuant to the legislative privilege.

Dated: December 16, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 16, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar